

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

-----X
In re:

BERNARD L. MADOFF,

Debtor.

-----X
IRVING PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DAVID IVAN LUSTIG,

Defendant.

-----X

NOTICE OF SUBSTITUTION OF COUNSEL AND PROPOSED ORDER

____PLEASE TAKE NOTICE that the law firm of Binder & Schwartz LLP, 366
Madison Avenue, Sixth Floor, New York, New York 10017, shall be substituted in place of
Richard E. Signorelli, Esq., Bryan Ha, Esq., and the Law Office of Richard E. Signorelli as
counsel of record for defendant David Ivan Lustig (“Defendant”) in this adversary proceeding.

All notices given or required to be given in this adversary proceeding shall be given to and served

upon the following:

BINDER & SCHWARTZ LLP
366 Madison Avenue, Sixth Floor
New York, New York 10017
Attn: Eric B. Fisher
Telephone: (212) 510-7008
Facsimile: (212) 510-7299

PLEASE TAKE FURTHER NOTICE THAT the Defendant has knowledge of and
consents to this substitution of counsel.

Dated: New York, New York
December 15, 2017

Dated: New York, New York
December 15, 2017

LAW OFFICE OF
RICHARD E. SIGNORELLI

BINDER & SCHWARTZ LLP

By: /s/ Richard E. Signorelli
/s/ Bryan Ha

By: /s/ Eric B. Fisher

Richard E. Signorelli
Bryan Ha
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New York, NY 10003
Telephone: 212 254 4218
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Facsimile: (212) 510-7299
efisher@binderschwartz.com
www.binderschwartz.com

Dated: New York, New York
December __, 2017

SO ORDERED:

HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

-----X
In re:

BERNARD L. MADOFF,

Debtor.

-----X
IRVING PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

Adv. Pro. No. 10-4554 (SMB)

v.

DAVID IVAN LUSTIG,

Defendant.

-----X
DECLARATION OF BRYAN HA

BRYAN HA hereby declares under penalty of perjury, pursuant to 28 U.S.C. §
1746, that the following are true and correct:

1. I am of counsel to the Law Office of Richard E. Signorelli and a member
of the Bar of this Court. Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States
District Courts for the Southern and Eastern Districts of New York, I submit this declaration in

support of the accompanying notice and proposed order substituting the law firm of Binder & Schwartz LLP for Richard E. Signorelli, Esq., Bryan Ha, Esq., and the Law Office of Richard E. Signorelli as counsel for defendant David Ivan Lustig (“Defendant”) in the above-captioned adversary proceeding. I have also read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendant has requested and consents to this substitution of counsel.

3. It is not expected that any undue delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Dated: New York, New York
December 15, 2017

/s/ Bryan Ha
Bryan Ha